



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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BY ECF

Honorable Robyn F. Tarnofsky
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

The request to extend the fact discovery deadline until February 4, 2025 is GRANTED. No further extensions of this deadline will be granted absent good cause shown. The Clerk of Court is respectfully requested to terminate ECF 60.

Date: 11/18/2024
New York, NY

SO ORDERED

A handwritten signature in black ink, appearing to read "Robyn F. Tarnofsky", is written over a horizontal line.

ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

Re: Nathanial Herman v. City of New York, et al.
Index No.: 21-CV-06295

Dear Magistrate Judge Tarnofsky:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for Defendants in the above-captioned proceeding. I write jointly with Plaintiff's counsel, in accordance with the Court's May 22, 2024 case management plan (ECF Dkt. No. 49), to provide a discovery status update and to request that the Court extend the close of fact discovery from December 4, 2024 to February 4, 2024.

The parties have exchanged discovery demands and responses. As part of his discovery responses, Plaintiff provided several signed releases. Defendants have sent out the releases and are awaiting responses. Defendants are also preparing a supplemental discovery production and expects to produce these documents to Plaintiff within thirty (30) days. Plaintiff's deposition is scheduled to take place on December 2, 2024 by remote means.

The parties respectfully request a two-month extension of discovery to permit the parties to take depositions and serve post-deposition discovery demands. This is the parties' first request for an extension of discovery.

Accordingly, for the reasons set forth above, the parties respectfully request a two month extension of discovery for the purposes of completing depositions and post-deposition discovery demands.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Elisheva L. Rosen

Elisheva L. Rosen
Assistant Corporation Counsel

cc: **By ECF**
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Honorable Andrew L. Carter, Jr.
United States District Judge